

**Talking Points for Betsy Southerland for NACWA Ammonia Meeting
October 29-30, 2014**

- We thank you for inviting us to listen in on your discussions over the next day and a half so that we all may better understand the challenges in implementing the 2013 ammonia criteria.
- We think ammonia criteria adoption and implementation are important, and we appreciate your interest in the 2013 criteria recommendations.
- We look forward to working together in the future to find solutions to implementation challenges.
- EPA finalized its ammonia aquatic life criteria recommendations in August 2013.
 - Updated literature review (1985 – 2012) includes new toxicity data from 69 studies
 - Includes new data on mussels and snails
 - Includes data on aquatic animals listed as threatened, endangered or species of concern. (acute-14 species; chronic-3 species of salmonids)
- The criteria are based on the latest science including data for freshwater mussels and snails.
- In August 2013, EPA also provided additional information on the following to support implementation of the criteria:
 1. A procedure for deriving site-specific criteria based on resident species.
 2. Flexibilities that states, authorized tribes, and territories may use in applying the ammonia criteria (e.g., variances).
 3. Methods for determining the presence of freshwater mussels on a site-specific basis.
- Several states, tribes, and territories are currently in the process of adopting or planning to adopt the 2013 ammonia criteria recommendations into water quality standards in the next triennial review.
- EPA Headquarters and Region 7 are working closely with Kansas to assist the state in developing an appropriate multiple discharger variance that could apply to lagoons once Kansas has adopted the ammonia criteria statewide.
- We want states, tribes, and dischargers to think about nutrient issues holistically. Focusing on ammonia treatment is only part of the solution to the broader problem of nitrogen pollution. EPA is working on a paper to better help decision makers understand the potential cost savings associated with upgrading treatment facilities to address total nitrogen, not just ammonia, thus addressing two environmental problems at the same time.
- We know these implementation issues are complex, and we appreciate the time and effort you all are putting into these discussions. The EPA staff members that are here for the workshop are all looking forward to listening to the presentations and discussions over the next day and a half.
- And once again, we look forward to working together with all of you in the future to find appropriate solutions to the challenges of implementing the ammonia criteria.